

Exhibit 50

Excerpts of deposition of Gregory Stevens as TST 30(b)(6)
(November 3, 2023)

In the Matter Of:

THE SATANIC TEMPLE V. NEWSWEEK DIGITAL

1:22-cv-01343-MKV

GREGORY STEVENS

November 03, 2023

30B6



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THE SATANIC TEMPLE V. NEWSWEEK DIGITAL

November 03, 2023

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

THE SATANIC TEMPLE, INC.,

Plaintiff,

-against-

Case No.
1:22-cv-01343-MKV

NEWSWEEK DIGITAL, LLC

Defendant.

X

November

30(b)(6) Deposition of Plaintiff by
GREGORY STEVENS, taken by Defendant, held at
30 Rockefeller Plaza, New York, New York,
before Joseph R. Danyo, a Shorthand Reporter
and Notary Public within and for the State
of New York.



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November 03, 2023

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1
2 A P P E A R A N C E S :
3

4 KEZHAYA LAW PLC
5 Attorneys for Plaintiff and the Witness
6 150 S. Fifth Street
Suite 1850
Minneapolis, Minnesota 55401

7 By: MATT KEZHAYA, ESQ.
SONIA KEZHAYA, ESQ.
8

9
10 LAW OFFICES OF CAMERON STRACHER PLLC
11 Attorneys for Defendant
12 51 Astor Place
9th Floor
New York, New York 10003

13 By: CAMERON STRACHER, ESQ.
SARA TESORIERO, ESQ. (Via Zoom)
14

15
16 Also Present:
17 LAURA HENRIQUE, ESQ., Newsweek (Via Zoom)
18 RACHELLE PIKE, Paralegal, Cameron Stracher PLLC
(Via Zoom)
19

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GREGORY STEVENS 30B6
THE SATANIC TEMPLE V. NEWSWEEK DIGITAL

November 03, 2023

110

1 Stevens

2 nature, you want me to give you a high level
3 summary?

4 Q. Yeah, that would be great, based on
5 your record or your recollection.

6 A. Some of this is indirect knowledge.
7 Some of it is because, although I wasn't at this
8 time on the national council or anything when it
9 first started, I know Shelby and I know other
10 members of Austin fairly well. Yeah.

11 Conversations with people who were involved as
12 well. So Kiley started making claims about
13 Shelby. If you don't mind, I will actually refer
14 back to my document because I am bad with dates.

15 Q. Sure.

16 A. Kiley started making claims about
17 Shelby, and it was actually earlier than April
18 2020 sort of informally that some of these claims
19 were being made and even shared online that seem
20 to be sort of an effort to draw other people in
21 to, you know, quote warn people and let people
22 know unquote about Shelby before even an official
23 complaint was filed.

24 Then on or about in April of 2020 was
25 when, not Kiley, but an ex of Shelby's who also

GREGORY STEVENS 30B6
THE SATANIC TEMPLE V. NEWSWEEK DIGITAL

November 03, 2023

111

1 Stevens
2 was friends with Kiley e-mailed the national
3 council with the allegation that Shelby had
4 sexually assaulted Kiley. So the allegation was
5 that Shelby sexually assaulted Kiley. The report
6 was e-mailed in by a person who was a friend of
7 Kiley's and an ex of Shelby's.

National council's first response was
to encourage Kiley to file a police report, but
she said she was not going to do that. Over the
course of the following month or so, I'm trying
to think of a good neutral way of phrasing this,
because I don't want to sound like I'm making any
accusations one way or the other, but it seemed
like there was a lot of effort to reach out to
people, TST members individually, to, you know,
warn people, sway people, whatever language you
want to use, right, about this.

19 Q. By who?

20 A. By friends of Kiley's or friends of
21 Laura's, and it got to the point where someone,
22 it was Laura, threatened to go public quote
23 unquote, whatever that means, with the claim that
24 TST was covering up these accusations, and it was
25 at that point that Shelby stepped down.

GREGORY STEVENS 30B6
THE SATANIC TEMPLE V. NEWSWEEK DIGITAL

November 03, 2023

114

Stevens

even there was a point when the national council advised that like, you know, the congregation if you see stuff because there was so much stuff going on online, there was so much like people talking, you know, making accusations online and all this stuff, and so there was urging messages to leadership like please don't get involved, please don't respond, please don't argue back, just please, please, and then at one point I don't know exactly when this was, but the people, you know, like Laura because of the fact that every single, every single meeting in the congregation there was a lot of just constantly turning attention to themselves and to this and, hey, did you hear that Shelby, just constant, and it made it impossible for them to have meetings, and so they ended up making the decision to remove everybody, anybody who was involved in any side of the case, right, just anybody who was currently a part of the police investigation, we just please take some time, please take some time, and they were no longer part of Austin.

24 So yeah. That's really, like I said,
25 I'm speaking from the point of view of TST at the

GREGORY STEVENS 30B6
THE SATANIC TEMPLE V. NEWSWEEK DIGITAL

November 03, 2023

115

1 Stevens
2 point where Shelby stepped down and national knew
3 that there was police work going on, so there was
4 no more national interest in it, because like
5 this is being handled. Shelby is no longer a
6 part of this, and then from the point of view of
7 the congregation itself when eventually they
8 said, hey, for our members' comfort and safety,
9 anybody involved in the investigation based on
0 their behavior, and they're being removed, this
1 became no longer a TST thing even though there's
2 obviously --

Q. A lot of stuff about it?

A. Stuff that happened since then.

15 Q. Yeah. Okay. What result, if you
16 know, became of the police investigation of
17 Shelby?

A. They dropped the case.

19 Q. And Shelby resigned you said from
20 TST. Is that right?

21 A. He resigned from being in leadership
22 and a member of the congregation. I think he
23 still considered him himself a member of TST
24 generally, but yeah.

25 Q. And what about Kiley? What happened

GREGORY STEVENS 30B6
THE SATANIC TEMPLE V. NEWSWEEK DIGITAL

November 03, 2023

116

1 Stevens

2 to her vis-à-vis TST?

3 A. I don't know.

4 Q. So let's mark this as Exhibit 19.

5 (Defendant's Exhibit 19, Document
6 Bates stamped TST 430, was so marked for
7 identification, as of this date.)

8 Q. I just marked Exhibit 19 a document
9 Bates numbered TST 430. Do you recognize this
10 document?

11 A. I do not.

12 Q. I'll represent to you this was
13 produced by the Plaintiff in this lawsuit in
14 response to Newsweek's document request.

15 A. Okay.

16 Q. Do you see the reference in that
17 document to being banned from TST for filing a
18 report about a member of leadership in TST raping
19 them?

20 A. I see the sentence you're referring
21 to.

22 Q. Do you know whether Kiley was banned
23 from TST?

24 A. I know for a fact that Kiley was not.

25 Q. She was not banned. How do you know

GREGORY STEVENS 30B6
THE SATANIC TEMPLE V. NEWSWEEK DIGITAL

November 03, 2023

132

1 Stevens
2 let a lot of things slide. So many stories
3 involved leaving a lot of things to the side, but
4 then nothing had risen to the point of Jex being
5 a real topic of conversation until I remember, I
6 remember the evening getting the phone call
7 saying, hey, Jex just like literally like made a
8 statement about encouraging people to kill the
9 president in one of the rituals.

We need to freaking do something about this. Jex was almost a ghost prior to that. You know what I mean? Like doing things, not completely, because there were some things she did that were very antagonistic. We had chapters in Texas, and chapters tend to be very territorial isn't necessarily the right word, but they have their area, and so Jex just independently, no proposal, no communication, decided to like do a thing in Texas and got the Texas groups upset, because they felt like they were being, like why are we even here, if Jex can just without even telling us ahead of time do this ritual thing, this call for this action in our area.

So that kind of thing was the only

GREGORY STEVENS 30B6
THE SATANIC TEMPLE V. NEWSWEEK DIGITAL

November 03, 2023

134

1 Stevens

2 A. Sure.

3 Q. The bottom of page 6.

4 A. Yeah.

5 Q. So on May 9th, Doug Mesner, Lucien,
6 right?

7 A. Yes.

8 Q. Writes a draft e-mail?

9 A. Hang on. Hang on. Are you talking
10 about page 6?

11 Q. Yes. Page 6?

12 A. I'm looking at a page 6. Where's
13 May 9th?

14 Q. No. I'm sorry. May 5th, 2019.

15 A. I got it. Yeah, yeah, yeah.

16 Q. And I'm wondering if that refreshes
17 your recollection about the nature of this
18 e-mail, the timing, what it was referring to?

19 A. It does. Thank you very much. So
20 this wasn't a direct consequence of the incident
21 of her having a ritual in which she told people
22 that they should kill the president, which is why
23 she was terminated. You know, it wasn't that
24 incident, but after the movie came out --

25 Q. And, by the movie, you mean the movie

GREGORY STEVENS 30B6
THE SATANIC TEMPLE V. NEWSWEEK DIGITAL

November 03, 2023

172

1 Stevens
2 didn't get that document, and I think you
3 testified you're not aware of where or
4 whether that document exists, but, Matt,
5 if you can make an effort to see if you
6 could find that document, and I ask the
7 deponent as well.

8 THE WITNESS: I see.

13 Thank you all. Thanks very much.

14 | (Time noted: 3:40 p.m.)

Subscribed and sworn to
before me this ____ day of _____, 2023.

GREGORY STEVENS 30B6
THE SATANIC TEMPLE V. NEWSWEEK DIGITAL

November 03, 2023

173

1

2 C E R T I F I C A T I O N

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4 I, JOSEPH R. DANYO, a Shorthand Reporter
5 and Notary Public, within and for the State of New
6 York, do hereby certify:

7 That I reported the proceedings in the
8 within entitled matter, and that the within transcript
9 is a true record of such proceedings.

10 I further certify that I am not related, by
11 blood or marriage, to any of the parties in this
12 matter and that I am in no way interested in the
13 outcome of this matter.

14 IN WITNESS WHEREOF, I have hereunto set my
15 hand this 10th day of November, 2023.

16 
17

18 JOSEPH R. DANYO

19 STATE OF NEW YORK

20 My Commission Expires 2/20/2027

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